

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	CHAPTER 13
SHERRY A. GARDNER and	:	
NICHOLAS J. GARDNER, JR.,	:	
Debtors	:	
	:	
JACK N. ZAHAROPOULOS,	:	
STANDING CHAPTER 13 TRUSTEE,	:	
Movant	:	
	:	
vs.	:	
	:	
SHERRY A. GARDNER and	:	
NICHOLAS J. GARDNER, JR.,	:	
Respondents	:	CASE NO. 1-22-bk-01579-HWV

TRUSTEE'S OBJECTION TO FOURTH AMENDED CHAPTER 13 PLAN

AND NOW, this 10th day of June 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Douglas R. Roeder, Esquire, and objects to the confirmation of the above-referenced Debtors' Plan for the following reasons:

1. Trustee avers that Debtors' Plan is not feasible based upon the following:
 - a. Insufficient Monthly Net Income as indicated on Schedules I and J.
 - b. The Plan is underfunded relative to claims to be paid. The Plan needs to pay about \$44,364 to be fully funded.
 - c. The Plan is ambiguous as to the payment and base amount. The tier amounts and the base amount do not total correctly.

WHEREFORE, Trustee alleges and avers that Debtors' Plan cannot be confirmed, and therefore, Trustee prays that this Honorable Court will:

- a. deny confirmation of Debtors' Plan;
- b. dismiss or convert Debtors' case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/ Douglas R. Roeder, Esquire
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 10th day of June 2025, I hereby certify that I have served the within Objection by electronically notifying all parties or by depositing a true and correct copy of the same in the Unites States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Gregory S. Hazlett, Esquire
7 West Main Street
Mechanicsburg, PA 17055

/s/ Derek M. Stroupbauer, Paralegal
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee